

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THERESA STUMPF,)	
on behalf of herself and a class,)	
)	
Plaintiff,)	
)	12-cv-4688
vs.)	
)	Judge Gettleman
PYOD, LLC, and)	
WELTMAN, WEINBERG &)	
REIS CO., LPA,)	
)	
Defendants.)	

STIPULATION

Defendants, PYOD, LLC and Weltman, Weinberg & Reis Co., LPA, stipulate that they will not make any offer or tender to Plaintiff Theresa Stumpf, including but not limited to an offer pursuant to Fed. R. Civ. P. 68, that would have the effect of mooted Plaintiff's claims in this matter on behalf of the putative class defined in the Complaint.

However, this stipulation does not preclude Defendants from serving a Rule 68 offer in the following circumstances: (1) If Defendants send all counsel of record for Plaintiff an e-mail notifying Plaintiff that Defendants intend to serve a Rule 68 offer on an individual basis, then Defendants may serve such a Rule 68 offer beginning on the seventh day after the e-mail notification was sent (but not before such time); (2) Defendants may serve a Rule 68 offer on a class wide basis at any time. In consideration of the foregoing, Plaintiff stipulates to withdraw the pending motion for class certification without prejudice.

Respectfully Submitted,

THERESA STUMPF

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CERTIFICATE OF SERVICE

I, Catherine A. Ceko, hereby certify that on July 10, 2012, a true and accurate copy of the foregoing document was filed via the Court's CM/ECF system and notification of such filing was sent to the following parties:

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s/ Catherine A. Ceko
Catherine A. Ceko